



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CK/LXN
F.#2010R01079

271 Cadman Plaza East
Brooklyn, New York 11201

February 17, 2012

By Federal Express & ECF

Joel S. Cohen, Esq.
128 Mott Street, Ste 706
New York, New York 10013

Re: United States v. Chang
Criminal Docket No. 11-0067 (S-2) (SJ)

Dear Mr. Cohen:

Enclosed please find two CDs and one hard drive containing the government's continued discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government hereby also requests reciprocal discovery.

The materials include:

- (a) One CD (128993) containing recordings of calls made by the defendant while she was being held at Rikers Island (Rose M. Singer Center) in September 2010;
- (b) One CD containing a daily planner belonging to a St. John's University student (125371-125466); and
- (c) One hard drive (127819) containing documents found on computers associated with the defendant and administrative assistants working for the defendant at St. John's University.

2

If you have any questions or further requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney
Eastern District of New York

By: /s/
Charles Kleinberg
Lan Nguyen
Assistant U.S. Attorneys
(718) 254-6012/6162

Enclosures

CC: Clerk of Court (SJ) (w/o enclosures)